

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

IN RE POLYURETHANE FOAM ANTITRUST
LITIGATION

This document relates to:

ALL CASES

MDL Docket No. 2196

Index No. 10-MD-2196 (JZ)

JUDGE JACK ZOUHARY

NOTICE OF DEPOSITION OF BARRY “BILL” J. LUCAS

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 30, certain Direct Action Plaintiffs and the Indirect Purchaser(Class) Plaintiffs (“Plaintiffs”) will take the deposition of Barry “Bill” J. Lucas at Freshfields Bruckhaus Deringer, located at 65 Fleet Street, London EC4Y 1HS, United Kingdom, on August 13, 2013, at 9:00 a.m. London Time (BST). The testimony will be recorded by stenographic and videotaped means by a person authorized to administer oaths. The deposition shall continue from day to day until completed in accordance with the Federal Rules of Civil Procedure and the orders of this Court. All parties are invited to attend.

Pursuant to the Court’s order at the October 24, 2012 hearing (ECF No. 436 at 77–78), Plaintiffs provide a brief description of the deponent, to extent allowed by the protective order in this matter, as follows: former CEO and President of Vitafoam Inc.

Dated: July 29, 2013

/s/ Chahira Solh

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Dated: July 29, 2013

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*Interim Lead Counsel for Indirect Purchaser Class
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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that, in accordance with Paragraph 10 of the Initial Case Management Order, a copy of the forgoing document was served on Lead Counsel for Plaintiffs, counsel for Defendants, and counsel for the witness via electronic mail this 29th day of July, 2013.

Dated: July 29, 2013

/s/ Chahira Solh
Chahira Solh